

# **Compliance Bulletin - Home Medicines Review**

The Pharmacy Programs Administrator (PPA) Compliance team has prepared this bulletin to support your compliance with the <u>HMR Program Rules</u>. The <u>Compliance</u> section of the PPA website and the <u>PPA Monitoring</u>, <u>Compliance and Audit Factsheet</u> include more educational material. The flowchart below highlights some of the key elements to consider when you conduct a Home Medicines Review (HMR):

### **Home Medicines Review Flowchart**

1 Referral based on clinical need	The Referring Medical Practitioner will assess the patient's suitability and eligibility for the initial service
2 Patient consent	The HMR Patient Consent Form is signed by the patient prior to the HMR service
3 Patient interview	The <b>face-to-face</b> Interview and medication review is completed in the patient's home
4 Reporting	The HMR report is prepared by the pharmacist and sent to the Referring Medical Practitioner
5 Follow-up services	A follow-up service to resolve medication-related issues reported in the initial interview is organised if a clinical need is identified

#### 1. Referral based on clinical need

- ✓ The Referring Medical Practitioner is typically the patient's General Practitioner but may also be a Specialist in Pain Medicine or Palliative Medicine, Specialist Physician or Specialist Psychiatrist. They generate a written referral, which is based on an identifiable clinical need for a HMR and includes all the clinical information that is relevant for you.
- ✓ Before conducting the HMR, check that the referral from the Referring Medical Practitioner details the clinical reason for the HMR.
- ✓ The referral should be addressed to the Service Provider who will be claiming the HMR. If this is **not** the case, you must keep evidence that clearly shows why and how the referral was passed on to you.
- ✓ Keep copies of all referrals for audit and compliance purposes.

\* A request for referral document that has been created by a Service Provider and signed by a Referring Medical Practitioner is not considered best practice. A Service Provider may identify the need for a HMR and provide a recommendation to the patient's Referring Medical Practitioner. However, the Referring Medical Practitioner must still provide a written referral accompanied by any relevant information.

### **PPA Service History Checker**

The PPA has recently reviewed cases where different Service Providers received the same referral for a patient. Please note only **one** HMR claim can be submitted for each HMR referral.

Before scheduling a patient interview, it is advised that you check in the PPA Portal Service History Checker as shown in the screenshot below to determine whether a HMR has been recently conducted for the patient. You should also confirm with the patient if they have recently received a HMR: another Service Provider may have conducted the HMR but not yet submitted their HMR claim in the PPA Portal.



#### 2. Patient consent

- ✓ To correctly obtain a patient's informed consent, you need to guide the patient through the information in the current HMR Patient Consent Form. Once they understand what they are consenting to, the patient gives their consent before each initial HMR interview by signing the Patient Consent Form. The information in the form explains that you also need their consent for you to collect their personal information and provide their details to the PPA and the Department of Health, Disability and Ageing for you to receive payment for the service. Patient consent also allows access to the patient's data from their usual community pharmacy and My Health Record as part of the HMR service.
- ✓ Complete all the relevant fields in the Patient Consent Form in full, including the date of service and the date of consent.
- ✓ Consent obtained before an initial HMR interview also covers the first and second follow-up services (if they are clinically required).
- Incomplete Patient Consent Forms that do not include the signature of the patient or their authorised person, the date of service, and the date of consent may result in claims being cancelled.

Verbal patient consent forms cannot be accepted.

#### 3. Patient interview

- ✓ A Credentialed Pharmacist conducts the patient interview face-to-face with the patient in their home. In limited circumstances the patient interview is conducted outside the patient's home or by a Registered Pharmacist. Prior approval is required by submitting a Program Variation request in the PPA Portal.
- ✓ For comprehensive medication management reviews such as a HMR, the <u>PSA</u>
  <u>Guidelines</u> recommend that you spend 45 to 60 minutes interviewing a patient (or more, depending on the complexity or number of issues).
- × Patient interviews must not be conducted by telehealth.

### 4. Reporting

- ✓ In the HMR Report, include information from the patient interview and other relevant sources and outline recommendations to assist in developing a medication management plan. The HMR Report should also indicate if any follow-up services are needed.
- ✓ Send the HMR Report to the Referring Medical Practitioner.
- \* HMR Reports that do not effectively document the details of the service delivered, including the date of service and relevant recommendations, do not align with best-practice documentation and record keeping.

## 5. Follow-up services

- ✓ In follow-up services, focus on resolving any medication-related problems that were identified in the initial HMR patient interview.
- ✓ The <u>PSA Guidelines</u> recommend that you spend 20 minutes on a follow-up service (or more, depending on the complexity or number of issues).
- ✓ Follow-up services are ideally delivered by the same Credentialed Pharmacist.
- ✓ Ensure you make a clinical record of the follow-up service and any actions or recommendations arising from the review.
- ✓ A Credentialed Pharmacist may initiate a follow-up service based on the patient's clinical need.
- Follow-up services should not be initiated as a matter of routine.
- Follow-up services should not be initiated if a clinical need to resolve medication-related problems was **not** identified in the initial HMR service.
- Follow-up service claims cannot be submitted after another initial HMR has been conducted.

### **Compliance support**

The PPA encourages you to read the <u>HMR Program Rules</u> and <u>PPA General Terms and Conditions</u> carefully. The PPA Compliance team is available to support you and clarify the program requirements to help you to comply. For general compliance enquiries, please call 1800 951 285 and ask to speak to a member of the Compliance team.